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Attorneys for Creditor, Metalforming Technologies, Inc.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

Case No. 05-44481 (RDD)

DELPHI CORPORATION, et al.,

(Jointly Administered)

Debtors.

METALFORMING TECHNOLOGIES, INC.'S NOTICE OF DEPOSITION OF DEBTORS PURSUANT TO FED. R. BANKR. P. 7030 AND FED. R. CIV. P. 30(b)(6)

MetalForming Technologies, Inc. ("MTI") will take the oral deposition under oath pursuant to Fed. R. Bankr. P. 7030 and Fed. R. Civ. P. 30(b)(6) as made applicable to this contested matter pursuant to Fed. R. Bankr. P. 9014 under oath, of certain designees of Debtors Delphi Corporation, et al. to be recorded by stenographic means in connection with the contested matter pending before this Court in connection with Debtors' Eighteenth Omnibus Objection (Procedural) Pursuant to 11 <u>U.S.C.</u> § 502(b) and Fed. R. Bankr. P. 3007 To Certain Duplicate or Amended Claims and MTI's Response [Dkt. No. 9042].

The deposition(s) shall commence at the following date, time and place:

Place:

Ellen Grauer Court Reporting

126 E. 56th Street

New York, NY 10022

Date:

November 2, 2007

Time:

10:00 a.m.

Scope of Examination: Debtors are demanded, pursuant to Fed. R. Bank. P. 7030 and Fed. R. Civ. P. 30(b)(6), to designate one or more officers, directors and/or representatives with knowledge and information on the topics set forth in the list attached hereto and made a part hereof.

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Attorneys for Creditor, Metalforming Technologies, Inc.

Dated: October 16, 2007

SCOPE OF EXAMINATION/TOPICS PURSUANT TO FED. R. CIV. P. 30(b)(6)¹

- 1. The factual basis for the Objection as to MTI's Claim No. 16612.
- Debtors' Fifteenth Omnibus Claim Objection as it pertained to MTI's Claim No.
 - 3. The relief sought by the Debtors in the Objection.
- 4. Negotiations and/or discussions with MTI or its representatives relating to or in connection with Debtors' Fifteenth Omnibus Claim Objection.
 - 5. The status of MTI Claim No. 9190 in Debtors' bankruptcy case.
 - 6. The reclassification of MTI Claim No. 9190.
 - 7. Any reclamation claim filed by MTI.
 - 8. The timing of the filing of Claim No. 9019 and Claim No. 16612.
- 9. The procedural history of Debtors Fifteenth Omnibus Objection and the Objection.
 - 10. The amounts claimed due by MTI in Claim No. 16612.
- 11. The business history and dealings between MTI (and its successors and/or assigns) and Debtors including any credits or overcharges or overpayments claimed by Delphi.

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¹ All capitalized terms shall have the meaning ascribed to them in Metalforming Technologies, Inc.'s Response to Debtors' Eighteenth Omnibus Objection (Procedural) Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 To Certain Duplicate or Amended Claims [Dkt. No. 9042] except as expressly defined otherwise herein.